1	3. I submit this Declaration in support of the Stipulation and [Proposed] Order to
2	Extend Case Deadlines filed by Defendant Oracle America Inc. ("Oracle") and Plaintiffs Michael
3	Katz-Lacabe and Dr. Jennifer Golbeck ("Plaintiffs").
4	4. I met and conferred with Oracle's counsel on March 21 and 22, 2024 to discuss a
5	potential extension of the remaining case deadlines. The parties agreed to formally mediate this
6	matter and communicated on how an extension of the class certification schedule could facilitate
7	that process.
8	5. Plaintiffs also believe that an extension is necessary because additional discovery is
9	required. For example, the Court's October 18, 2023 Order to Extend Case Deadlines ("Order")
10	(ECF No. 83) gave Oracle 30 days from the Court's decision on the pending motion to dismiss to
11	file an answer to the Second Amended Complaint ("SAC"). The deadline for Oracle to file an
12	answer to the SAC may thus fall after the current May 1, 2024 deadline for Plaintiffs to move for
13	class certification. In addition, Plaintiffs will then need time to seek discovery regarding any
14	affirmative defenses raised in Oracle's answer.
15	6. The parties agreed, pending the Court's approval, to extend the deadlines for
16	Plaintiffs' motion for class certification, Oracle's opposition, and Plaintiffs' reply.
17	7. The parties have previously stipulated five times to extend deadlines in this case
18	(ECF Nos. 21, 50, 52, 59, 82), each of which the Court approved (ECF Nos. 22, 51, 53, 60, 83).
19	I declare under penalty of perjury that the foregoing is true and correct.
20	Executed in New York, New York, this 25th day of March, 2024.
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22	/s/ Michael W. Sobol
23	Michael W. Sobol
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